
Care Labeling and the Textile Industry

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I'm going to talk today about care labeling and how the textile industry interfaces with that. I'm going to reserve most of my comments to talk about the new care symbol systems. I want to talk about how the industry interfaces in terms of wet cleaning. I also want to thank the U.S. Environmental Protection Agency (EPA), Dr. Wentz, and Ohad Jehassi for inviting the American Textile Manufacturers Institute (ATMI) to be a co-sponsor for this program. We were first aware that EPA was looking at alternative dry cleaning techniques about 4 years ago. At that time, and since then, we have been contacted twice by EPA to find out what our industry's position is on this. Basically, however, we have not been involved in this process. We have a great deal at stake and in order for you to be successful, you must engage our industry in this process.

First of all, I want to talk about what ATMI is and what we represent. I also want to describe to you the fiber, textile, apparel, retail pipeline. It is a commerce stream, and it starts at one end with raw fibers—both natural fibers such as cottons and wools, and synthetic products such as nylons and polyesters. We convert them into fabrics which are handed over to an apparel manufacturer who cuts and sews the fabric into garments. The garment is then transferred downstream to the retailer who provides that product to the end consumer. ATMI represents one segment within this pipeline. We are involved in the actual manufacturing of textile products. This includes yarns, threads, fabrics, and in some cases, end products. We use techniques such as weaving, knitting, non-woven paper-type production, printing, dyeing, finishing, and tufting of these fibers into textiles or fabrics. We also have members that produce products such as bandages, carpets, comforters, sheets, linens, and literally thousands of different end products. But as an association, we do not represent apparel interests.

There's one other issue I'd like to address here, which is some of the terminology that has been floating around. I've often heard the discussion of garment care as being fabric care and textile care. From an industry perspective, we would prefer to use the terminology "garment and apparel care," because that's really what we're talking about. We're talking about a specific end product and addressing its cleaning techniques.

ATMI's member companies, consume approximately 80 percent of all fibers utilized in U.S. textile operations. The gross domestic product (GDP) of this fiber, textile, and apparel pipeline is \$60 billion. It is the second largest industry in the United States, following the auto industry at about \$67-69 billion. The fiber industry is about \$8 billion, textiles are \$25 billion, and apparel is \$28 billion. Textile sales in 1995 alone were \$69 billion. The GDP is an integration which takes out the value added in all of those steps. Over the past 10 years, our industry has been spending approximately \$2 billion annually to modernize our facilities. We're doing this for several reasons: to increase our productivity, increase our efficiency, and improve the quality of the products we're providing. We're also modernizing for a lot of environmental reasons: to reduce energy consumption, reduce water consumption, and to produce a more environmentally friendly product.

When we talk about consumer labeling, I want to make you aware of the fact that the industry actually complies with four different labeling regulations. At this point, we've only discussed one, which is Trade Regulation Rules on Care Labeling of Textile Products for General Wearing Apparel and Certain Piece Goods—I will just call it the Care Labeling Act. The other two regulations that are enforced by the Federal Trade Commission include the Textile Fiber Products Identification Act (TFPIA) and the Wool Products Labeling Act. The Wool Products Labeling Act goes all

the way back to the 1930's and is essentially a consumer protection regulation. So when you go out and buy your cashmere sweater, you in fact are getting cashmere, not mohair. The other regulation that the industry deals with is one on a state level. It's called The Uniform Packaging and Labeling Regulation, and it basically deals with the physical dimensions or characteristics of products. So when you go to the grocery store and you buy a can of tomato paste, and it says that it's 8 oz. or 12 oz., that in fact is a requirement under this rule. The enforcement under that rule occurs at the state level, so state metrology or state weights and measures offices are responsible for it. Our segment of the industry, in terms of producing carpets and home furnishings products, must include dimensions to describe to the consumer what they're buying.

The Care Labeling Act requires a number of different things. In fact, it requires different things of the textile industry than it does of the apparel industry. It is mandatory for apparel, but it is not required for home furnishings products. Our industry, since the promulgation of the rule in 1971, has provided care instructions to the consumer on a voluntary basis. The rule does not address industrial products. What happens in this pipeline stream is that we do not provide a permanent care label to each bolt of fabric that we sell to our customers. We typically provide that information on the invoice as the product is transferred downline.

TFPIA is really a very important regulation. It's applicable to apparel and home furnishings. There are mandatory requirements. Country of origin and manufacture identification is required to be permanently attached to the product at the point of sale. Fiber type, however, is provisional. Most industry people in the United States automatically provide this on a permanent care label, but it is a voluntary option. It is an important piece of information, however, because when the consumer goes to purchase an article of clothing, their decision is made based on previous experience with the product. So when I pick out a suit in a store and it says wool, I'm going to know based on the fiber type, what I can do with this product and what the expected life of it will be. Again, as we transfer the fabrics downstream to our customers, this information is generally provided on an invoice.

Now, I want to talk a little bit about ATMI in terms of how we relate to the environment. In 1992, we started a new program called Encouraging Environmental Excellence (E3). At this point in time, more than 50 percent of our members are involved in this program. What the program does is ask our members to go above and beyond local, EPA, and state environmental requirements. In our E3 1994 annual report, it talks about our 10 point program representing the minimum

criteria companies must meet in order to participate in the program.

I think the real selling point of the program is the fact that if a member goes through this process, they've essentially qualified for International Organization for Standards (ISO) 14001, the new environmental management system standard that will come out next year. I think it's a real feather in our cap that our members have done this. The only thing that would be required for our companies to meet ISO 14001 is for an outside third-party certifier to come in and audit the books. The E3 logo is essentially a marketing program for our members to show that they in fact are a company that is committed to environmental initiatives. Some of you may have seen this logo in the L.L. Bean catalog.

Now let's talk about ATMI's position on the Care Labeling Rule, with regards to the new wet and "eco-cleaning" techniques. ATMI does support the proposal to change the rulemaking to allow the optional use of symbols to provide consumers with care instructions. Additionally, we support the dual labeling requirement to provide dry cleaning and eco options (I'm going to use eco not just wet), meaning alternative technologies, to describe to the consumers that they have these options. Our support of that is based on the provision that the requirement would only be applicable to items that normally would be dry cleaned. If it were applicable to products that would normally only be laundered it would lead to increased testing for us, increase labeling costs, and could increase the consumption of perc and other solvents.

I think our E3 program demonstrates that ATMI does support eco initiatives. We do have some concerns about the potential of moving forward with these new technologies because these technologies have not been used with the pipeline of products that are out there. If the consumer has the idea that they can just take any of their clothing out of their closet and take it to a local Greener Cleaner, we would expect to see more damage claims. We would expect to see problems including shrinkage, color loss, dye transfer, color bleeding, felting of wools, stiffness in some fabrics, and water stains and water marks. I was very interested in the comments that were provided yesterday, both on the Greener Cleaner project in Chicago and in Germany, and I'm very pleased to hear that there are now up to 31,000 garments that have been tested with this new technology. We need more testing. The 31,000 samples that have been tested are minuscule compared to the 12 billion garments that are sold in the United States annually.

Yesterday, Dr. Josef Kurz told us about research being carried out in Germany. He indicated that approximately 200 million garments are cleaned annu-

ally. Please note that these 200 million garments only represent slightly over one and a half percent of the U.S. annual market. The German experience is a very good example, but it does not automatically correlate to the size and scope of the U.S. marketplace.

The industry will not be able to automatically modify our product, or reformulate to meet the rigors of these new cleaning technologies. That would include our spinning operations, how we take fiber and spin it to make it into yarn, how we take those yarns and then convert them into woven goods or knit goods. It would include how we scour, that is, how we clean the fabric before we prepare it for adding dyes and finishes. The technology that exists in the textile industry today is based on 300 years of product development. A lot of that product development has come over the last 50 years with the advent of a number of synthetic products and synthetic fibers. That doesn't mean that we won't change, but I'm not going to stand up here and say that our industry is automatically going to accept all of this and reformulate our products.

I also want to emphasize that, as we discussed yesterday, just because a product can be eco cleaned does not necessarily guarantee that the manufacturing

processes that went into the development of that end product were done in an environmentally friendly manner. So we have to be able to weigh these options. If it's more important on one end, what does it mean we give up on the other end?

I also want to stress the kind of time line that we're talking of in terms of taking fibers from one end of the pipeline and getting it down to the end consumer. Normally, most textile operations can take anywhere from 6 to 18 months to transfer the raw fiber to the end product that goes to the consumer. It will require a very large amount of time for the industry to make modifications. In some cases, it might be an easy fix; it might be something the company can do within a 2-month period of time to reformulate to develop a better product. But in some cases, we may never be able to find a solution that will take every single fiber, every single product and guarantee that it can be cleaned with these new technologies.

The other major factor that will really drive whether or not we are all successful is whether the consumer will accept the end product that comes out of the pipeline stream.

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Care Labeling and the Textile Industry

Apparel Care and the Environment:
Alternative Technologies and Labeling
September 9-10, 1996

2

This is ATMI

- Manufacturing
- Techniques
- End Products

3

This is ATMI

- Membership represents 80% of fiber consumption
- GDP > \$60 B
- Modernization - \$2 B

4

Consumer Labeling Rules and Regulations

Textiles and Apparel Required To Meet Four Rules

- Care Labeling Act
- Textile Fiber Products Identification Act (TFPIA)
- Uniform Packaging and Labeling Regulation (NCWM)
- Wool Products Labeling Act

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Care Labeling Act

Promulgated in 1971

- Labeling Requirements for Product Disclosure to the Consumer
 - *Apparel—Mandatory*
 - *Home Furnishings—Voluntary*
 - *Industrial—No Requirements*
 - *Upstream Manufacturers Supply Care Instructions Via Invoice*

6

TFPIA

Promulgated in 1950s

- Products
 - *Apparel and Home Furnishings*
- Product Information
 - *Fiber Type, Country of Origin, and Manufacturer's Identification*
- Manufacturer's Supply Information Via Invoice

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ATMI and the Environment

*Encouraging Environmental Excellence Program
Promulgated in 1992*

- > 50% of ATMI Members Enrolled
- Company Programs Exceed EPA, State, and Local Requirements

8

ATMI and the Environment

*Encouraging Environmental Excellence Program
Promulgated in 1992*

- Environmental Management
10 Point Program
- E3 Members Meet ISO 14001

9

ATMI and Care Labeling

- Support Current FTC Rulemaking To Change Care Labeling Act

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ATMI and Care Labeling

- Support Dual Labeling of Dryclean and Eco-Clean Systems
 - *Should Apply Only to Products Normally Drycleaned*

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Implementation of Eco Cleaning Systems

- ATMI Supports Eco-Initiatives
- More Damages Seen if Customers Perceive that Methods Work for All Products

12

Implementation of Eco Cleaning Systems

Limitations

- Industry cannot Automatically “Turn Over” or Modify Products
 - *New Cleaning Methods Require New Formulations*

Implementation of Eco Cleaning Systems

Limitations

- Fiber, Textile, and Apparel Retail Pipelines
 - *6 to 18 Months*
- Phase-In Time Required by Industry
 - *Minimum of Several Years*